

Appendix B

**San Diego Air Pollution Control District (SDAPCD)-
Record of Non-Applicability (RONA)
and
Air Emissions Calculations**

RECORD OF NON-APPLICABILITY (RONA) FOR CLEAN AIR ACT CONFORMITY

INTRODUCTION

The U.S. Environmental Agency (USEPA) published "Determining Conformity of General Federal Actions to State or Federal Implementation Plans; Final Rule," in the 30 November 1993, Federal Register (40 CFR Parts 6, 51, and 93). The U.S. Navy published "Interim Guidance on Compliance with the Clean Air Act General Conformity Rule" in Appendix F, OPNAVINST 5090.1B dated 1 November 1994.

Federal regulations state that no department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license to permit, or approve any activity which does not conform to an applicable implementation plan. It is the responsibility of the Federal agency to determine whether a Federal action conforms to the applicable implementation plan, before the action is taken (40 CFR Part I 51.850[a]).

Federal actions may be exempt from conformity determinations if they do not exceed designated *de minimis* levels for criteria pollutants (40 CFR Part 51.853[b]). *De minimis* levels (in tons/year) for the air basin potentially affected by the proposed action are listed in Table 1.

Table 1. *De minimis* Levels for Criteria Pollutants in the San Diego Air Pollution Control District (SDAPCD)

Criteria Pollutant	<i>De minimis</i> level tons/year
VOC	50
NO _x	50
SO _x	*
CO	100
PM ₁₀	*

*The affected air basin is in attainment for regulated pollutant.

PROPOSED ACTION

Activity: Proposed at-sea demonstration testing of a plasma sound source in the marine environment offshore of Marine Corps Base Camp Pendleton outside of California coastal waters.

Proposed Action Name: Plasma Sound Source (PSS) Ocean Test Science & Technology Risk Reduction Phase. The PSS is also known as a "sparker," a device used for seismic and geophysical surveys.

Proposed Action Summary: The Navy proposes to conduct a test of the PSS over a period of eight contiguous days, along with a passive receive array, to help detect underwater and surface marine vessel activity. The PSS active acoustic test source will be used to produce pulsed impulsive sound during the proposed test to evaluate the potential for active pulsed sound to enhance the performance of passive sonar systems. Activities associated with the test include towing a barge to an offshore location where it will be

moored for the test duration and then towed back to port. The barge will be utilized for deployment, operation and retrieval of the arrays and equipment. In addition, the barge will be used for receiving, processing, displaying and storing data during the test. The test would occur during a 22-day period including deployment and retrieval times. A surface vessel will be used to tow the barge and another, smaller and more economical vessel will be used to conduct logistics runs to and from the barge as necessary. While the test site lies outside of the SDAPCD, vessel transits to and from the test site will occur in the SDAPCD, leading to the estimated air emissions summarized below.

Air Emissions Summary: Based on the air quality analysis for the proposed action, the maximum estimated emissions for the proposed ocean test will be below conformity *de minimis* levels (Table 2).

Table 2. Estimated Emissions Associated with the Proposed PSS Ocean Test (tons/year)

Equipment	VOC	NO _x	CO
Surface Vessels	0.08	0.58	0.17
Total Proposed Action	0.08	0.58	0.17
SDAPCD <i>de minimis</i> thresholds (tons/year)	50	50	100
SDAPCD regional emissions	87,600	80,300	547,500

Pollutant emission estimates are based on USEPA's AP-42 guidance.

Date RONA Prepared: 17 May 1999

EMISSIONS EVALUATION CONCLUSION

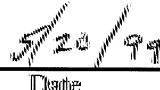
It is concluded that *de minimis* thresholds for applicable criteria pollutants would not be exceeded nor would the projected emissions be regionally significant (i.e., greater than 10 percent of the air basins' emission budgets) as a result of implementation of the proposed action. The emissions summary supporting that conclusion is shown above, and the calculation methodology and references are included in the Environmental Assessment for the PSS test. Consequently further Conformity Determination procedures are not required, resulting in this Record of Non-Applicability.

RONA APPROVAL

To the best of my knowledge, the information presented in this Record of Non-Applicability is correct and accurate and I concur in the finding that the proposed action is not subject to the General Conformity Rule.



James Wangler
ISR Directorate, Chief Engineer (PD 18E)
Space and Naval Warfare Systems Command


Date

Assumptions used for RONA preparation:

Ocean Test Assumptions:

Ocean Test:	Two surface support vessels
Ocean Test Area:	Offshore Marine Corps Base Camp Pendleton, San Diego County, CA
Ocean Test Time frame:	August – September 1999 (Eight contiguous days of testing during this period)

For purposes of estimating expected emissions from the proposed action, emission factors from USEPA's AP-42 were used.

Plasma Sound Source Ocean Test - Air Emissions Calculations

Source	Emission Factors					Load Factor	Usage Rate		Capacity Rating		Number Engines		Fuel Rate		Emissions (tons)				
	VOC	NOx	SOx	CO	PM10		Units	Days	Hrs/Day	Hrs/Test	Value	Unit	Value	Unit	VOC	NOx	SOx	CO	PM10
Deployment Vessel																			
							2												
	43.69	326	28.5	98	33	lb/1000 gal	0.8	10	20	1250	hp	2	0.055	gal/hp-hr	0.0481	0.359	0.031	0.1075	0.0363
	49.52	261	28.5	70	33	lb/1000 gal	0.2	1	2	1250	hp	2	0.055	gal/hp-hr	0.0014	0.007	8E-04	0.0019	0.0009
Maneuver	43.69	326	28.5	98	33	lb/1000 gal	0.5	1	2	1250	hp	2	0.055	gal/hp-hr	0.003	0.022	0.002	0.0067	0.0023
										Subtotals for Deployment Vessel				0.0524	0.388	0.034	0.1161	0.0395	
Support Vessel																			
							22												
	43.69	326	28.5	98	33	lb/1000 gal	0.8	1	22	425	hp	2	0.055	gal/hp-hr	0.018	0.134	0.012	0.0402	0.0136
	49.52	261	28.5	70	33	lb/1000 gal	0.2	0.5	11	425	hp	2	0.055	gal/hp-hr	0.0025	0.013	0.001	0.0036	0.0017
Maneuver	43.69	326	28.5	98	33	lb/1000 gal	0.5	0.5	11	425	hp	2	0.055	gal/hp-hr	0.0056	0.042	0.004	0.0126	0.0042
										Subtotals for Support Vessel				0.0261	0.189	0.017	0.0564	0.0195	
										Subtotals for both Surface Vessels				0.0786	0.578	0.051	0.1725	0.059	
Diesel generators																			
							22												
	45.73	563	36.6	121	39.99	lb/1000 gal	1	24	528	67	hp	1	0.055	gal/hp-hr	0.0445	0.548	0.036	0.1177	0.0389
	25 kw (33.5 hp)	45.73	563	36.6	121	39.99	lb/1000 gal	1	24	528	33.5	hp	1	0.055	gal/hp-hr	0.0222	0.274	0.018	0.0589
data from USEPA Publication AP-42																			
										Subtotals for Diesel generators				0.0667	0.822	0.053	0.1766	0.0584	
										Totals for PSS Ocean Test				0.1453	1.4	0.104	0.3491	0.1173	